

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Reading)**

IN RE: LISA M KOCHHEL Debtor	Case No. 22-11639-pmm
Santander Bank, N.A., Movant	Chapter 13
vs. LISA M KOCHHEL Respondent	11 U.S.C. §362

**STIPULATION IN SETTLEMENT OF OBJECTION TO CONFIRMATION OF
DEBTOR'S CHAPTER 13 PLAN**

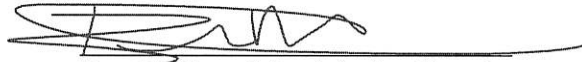
It is hereby stipulated by and between Brock & Scott, PLLC, counsel for the Movant, Santander Bank, N.A., and Brenna Hope Mendelsohn, Esquire, counsel for the Debtor, as follows:

1. The Debtor is Lisa M. Kochel in the above-captioned bankruptcy case.
2. Movant is Santander Bank, N.A., the secured mortgagee of a first lien on Debtor's property located at 268 Colorado Drive, Birdsboro, Pennsylvania 19508 ("Property").
3. Movant filed a proof of claim on September 1, 2022 regarding the mortgage lien on the Property listing arrears in the amount of \$109,777.11. Claim No. 2.
4. Debtor filed an Amended Plan on July 16, 2022. (Doc #20).
5. Movant filed an Objection to Plan stating that the Loan Modification provision is speculative in nature and given the large pre-petition delinquency Movant objects to the confirmation of the Plan.
6. The Parties agree that debtor will have 90 days from the date of this Order to get a loan modification.
7. If the debtor does not have the trial loan modification in place in 90 days from the date of this Order, debtor will amend the Chapter 13 plan to include the arrears in the Proof of Claim filed.

IN WITNESS WHEREOF, and intending to be a legally bound hereby, the parties to the above-captioned action, by their respective attorneys, each of whom has been expressly authorized to enter into this Stipulation of Settlement, set their signatures below.

Dated: January 3, 2023

/s/ Andrew Spivack
Andrew Spivack, Esquire
Attorney for Movant


Brenna Hope Mendelsohn, Esquire
Attorney for Debtor


Scott F. Waterman, Esquire
Trustee

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ORDER

AND NOW, this ____ day of _____, 2022, it is hereby **ORDERED** that the corresponding Stipulation is hereby approved, shall be, and is hereby made an Order of this Court.

Honorable Patricia M. Mayer
United States Bankruptcy Judge